

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

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SAMANTHA HENDRICKS

Plaintiff,

v.

AMERICAN SHIPPING AND  
PACKAGING, INC., and

MALIEK D. CARTHORN,

Defendants.

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)  
) Civil Action No.: 5:17-cv-02549-JRA  
)

) Judge John R. Adams  
)

) REPORT OF PARTIES'  
) PLANNING MEETING UNDER  
) FED. R. CIV. P. 26(f) AND LR  
) 16.3(b)(3)  
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**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16:3(b)(3), a meeting was held on **March 5, 2018** and was attended by:

**Molly Tefend**, counsel for Plaintiff **Samantha Hendricks**, and

**Kyle L. Stone**, counsel for Defendants **American Shipping and Packaging, Inc. & Maliek D. Carthorn**.

2. The Parties:

\_\_\_\_\_ have not been required to make initial disclosures.

  X   will exchange pre-discovery disclosures as required by Fed. R. Civ. P.26(a)(1) and the

Court's Order (Doc. No. 8) by **March 20, 2018.**

3. The Parties recommend the following track:

☐ Expedited ☒ Standard

☐ Administrative ☐ Complex

☐ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms:

☐ Early Neutral Evaluation

☒ Mediation

☐ Arbitration

☐ Summary Jury Trial

☐ Summary Bench Trial

☐ Case not suitable for ADR

5. The Parties ☒ do / ☐ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c). **(Magistrate Consent Form is attached to this Report as Exhibit A).**

6. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

**By Plaintiff: Plaintiff intends on conducting discovery that will support causes of action**

pursuant to the Fair Labor Standards Act and Ohio Wage Act as set forth in the Complaint; specifically, discovery regarding Plaintiff's job duties and compensation, Defendants' compensation structure and failure to pay overtime for all hours worked over 40 in a workweek, and Defendants' timekeeping and recordkeeping policies. Plaintiff anticipates that the nature of the discovery will include Interrogatories, Requests for Admission, Requests for Production of Documents, and Depositions.

*By Defendants:* Defendants intend to request Discovery of information the supports the Plaintiff's claims that she worked more hours then what she was paid for. We also intend to request information regarding any actions by Defendants that supports the Plaintiff's assertion that she was to work those alleged extra hours and the Defendant's agreed to pay accordingly. Defendants anticipates that the nature of the discovery will include Interrogatories, Requests for Production of Documents and Depositions.

(b) Discovery cut-off date: September 28, 2018

7. Recommended dispositive motion date: November 16, 2018

8. Recommended cut-off date for amending the pleadings and/or adding additional parties: May 25, 2018 .

9. Recommended date for a Status Hearing: August 22, 2018

10. Other matters for the attention of the Court: The Parties will exchange settlement demands/offers pursuant to the deadlines set forth in the Court's CMC Scheduling Order.

Attorneys for Plaintiff:

s/ Molly K. Tefend

Attorneys for Defendants:

s/ Kyle L. Stone

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of March, 2018 the foregoing Report of Parties' Planning Meeting Under Fed. R. Civ. P. 26(f) and LR 16.3(b)(3) was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/ Molly K. Tefend*

*Attorney for Plaintiff*